

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DUSHANNE ASHLEY,

Plaintiff,

vs

14-CV-05559 (NGG) (MDG)

THE CITY OF NEW YORK, DETECTIVE
JASON JONES, shield # 6490, DETECTIVE
MIKE CIVIL, shield # 2114, SERGEANT
LUKE DENESOPOLIS, shield #392, POLICE
OFFICERS JANE/JOHN DOE(S) #'S 1-10,

Defendants.

**DECLARATION OF DAVID ZELMAND, ESQ.
IN SUPPORT OF THE MOTION FOR A DEFAULT JUDGMENT**

I, David Zelman, Esq., hereby declare:

1. I am the attorney of record at Law Office of David A. Zelman, the attorney for Plaintiff Dushanne Ashley (“Ashley”) and as such, I am familiar with the facts and circumstances stated below. I submit this declaration in support of the motion for a directed verdict.

2. Attached as Exhibit A is a true and accurate copy of the first day of trial testimony on April 1, 2019.

3. Attached as Exhibit B is a true and accurate copy of the second day of trial testimony on April 2, 2019.

4. Attached as Exhibit C is a true and accurate copy of Plaintiff’s Exhibit 1 at trial, the original criminal complaint.

5. Attached as Exhibit D is a true and accurate copy of Defendant's Exhibit A at trial, the superseding indictment.

6. Attached as Exhibit E is a true and accurate copy of Plaintiff's Exhibit 5 at trial, the transcript of the July 15, 2014 and July 18, 2019 criminal court proceedings.

7. Attached as Exhibit F is a true and accurate copy of Plaintiff's Exhibit 6 at trial, the certificate of disposition.

I hereby declare under penalty of perjury the foregoing is true and correct.

Dated: New York, New York
June 28, 2019

_____/s_____
David Zelman